

Exhibit 15

Wednesday, December 13, 2023 at 10:41:09 Eastern Standard Time

Subject: RE: Coffee County Response to Public records request Coffee 4.5.23 --Communications with SOS attorneys & 4.10.23 -- HBS attorneys communications

Date: Friday, April 28, 2023 at 11:37:45 AM Eastern Daylight Time

From: Jennifer Dorminey Herzog

To: Marilyn Marks

CC: Vickers, Wesley, Vickers, Tracie, Anthony A. Rowell, Jeanne

Attachments: HBS_Email_Signature_1.19.22.jpg, image001.jpg, image002.jpg

Marilyn,

We respond to these requests in good faith but also expressly reserve the right to object to the validity of an open records request served on a private law firm providing legal services to a county in Georgia, including the argument that HBS and its attorneys and staff do not perform a government function that Coffee County would otherwise be required to perform under the law; therefore, that HBS does not prepare, maintain or receive any records, or hold records “on behalf of” the County that would be defined as public records of Coffee County under the Georgia Open Records Act, OCGA 50-18-70 et seq. We further object in that all records held in HBS’ possession are arguably privileged as either attorney client communication and/or attorney work product in accordance with O.C.G.A. 50-18-72(a)(41) and (42). Lastly, we note that as drafted many of your requests are so broad they could also be interpreted to include any private communications, texts, emails, etc. unrelated to county business or the role of providing counsel to Coffee County or the Coffee County Board of Elections; however, those would obviously not be included in the definition of a “public record” in O.C.G.A. 50-18-70(b)(2) and therefore not required to be produced in response to your request. As you are aware, HBS was the victim of a cyber breach on Saturday February 4, 2023 that has affected our electronic files; therefore we are still unable to access any electronic files prior to that date and, despite significant work by many experts, it is appearing we may never be able to access those files. Also, our emails are no longer in existence electronically before 4/28/21.

With the above stated, I have requested the attorneys at HBS referenced below search for and produce to me communications between our office and the names you reference below.

With regard to the 4.5.23 request you requested as follows:

Please provide all communications (including related documents) between Jennifer Herzog, Anthony Rowell, Nick Kinsley, or Stephen Delk and certain attorneys representing the Secretary of State’s office during the period January 1, 2021 to the date of your response to this request. Such attorneys representing the Secretary of State include Charlene McGowan, Ryan Germany, and Steven Ellis (of the General Counsel’s office) and any attorney at the Taylor English firm (@taylorenghish.com) or the Robbins firm (@robbinsfirm.com).

Any responsive communications that include Curling case plaintiffs’ attorneys or Marilyn Marks as senders or recipients are excluded from this request. Any documents previously

produced to Marilyn Marks or Curling case plaintiffs are also excluded from this request.

Response: As you know, there were a significant number of communications as part of the Curling litigation/subpoenas/depositions on which you and/or Plaintiff's counsel were copied so it took a significant amount of time to read through all the emails – I have done my best to search through the files and produce to you any communications in which the Curling Plaintiff's attorneys or yourself were not copied on. Please find those attached here.

<https://www.dropbox.com/s/562u085hwfhyz6/20230428112625.pdf?dl=0>

With regard to the 4.10.23 request requesting as follows:

“HBS attorneys’ communications (and related records) with Coffee County voters and civic leaders (non-clients) regarding Coffee County election policies, pending election-related decisions of county officials, reviews of election-related records,, election activities, and voting system-related matters. (The period for this request is November 8, 2020 -June 30, 2021). Include all documents discussed and meeting notes used in or related to meetings conducted with Coffee officials when non-clients and former officials, (such as Ed Voyles, Cathy Latham, or the Dominion Tech assigned to Coffee County), were present during the period November 8, 2020 through June 30, 2021.”

Examples of such records include Mr. Rowell's text messages and emails with Mr. Voyles or Ms. Latham concerning the 2020 and 2021 (senate runoff) elections in Coffee County or Georgia, including records related to the SOS investigations, recount and audit activities, potential legal actions, and all records evidencing any aspect of the unauthorized access to the voting system. This includes Mr. Rowell's meetings with Mr. Voyles and Ms. Latham related to Coffee County elections. (These are examples only, and not limitations on the responsive documents.)

Examples also include Mr. Rowell's Coffee County election-related communications with, or related to, Preston Haliburton, Robert Sinners, Alex Kaufman, Rudy Giuliani, SullivanStrickler representatives, Sidney Powell, Scott Hall, Alex Cruce, Bob Cheeley, Doug Logan, Jeffrey Lenberg, Jim Penrose, representatives of Dominion Voting Systems, and representatives of The Hilbert Law Firm.

Response: This correspondence is worded so broadly it could require the search of the almost 400 HBS attorneys email accounts. As we have previously agreed to, I have requested the search the accounts of Tony Rowell, Nick Kinsley, and myself who generally handle Coffee County. We have searched and not located any communications with the following named individuals in your example: Preston Haliburton, Robert Sinners, Alex Kaufman, Rudy Giuliani, SullivanStrickler representatives, Sidney Powell, Scott Hall, Alex Cruce, Bob Cheeley, Doug Logan, Jeffrey Lenberg, Jim Penrose, representatives of Dominion Voting Systems, and representatives of The Hilbert Law Firm. Reiterating the objections at the beginning of this email, we further respond: None.

Thank you for your payment of the \$300 estimated below. There is no additional cost for the response to these two ORRs.

Sincerely,

Jennifer Herzog

Jennifer Dorminey Herzog

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From: Marilyn Marks <[REDACTED]>

Sent: Friday, April 28, 2023 1:35 AM

To: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>

Cc: Vickers, Wesley <Wesley.Vickers@coffeecounty-ga.gov>; Stephen Delk <SDelk@hallboothsmith.com>; Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov>; Anthony A. Rowell <ARowell@hallboothsmith.com>; Jeanne <[REDACTED]>

Subject: Re: Coffee County Response to Public records request Coffee 4.5.23 -- Communications with SOS attorneys

Jennifer,

Sorry for my delay in responding to your request for clarification.

Please immediately provide the documents you gathered in response to the original 4.5.23 request.

I apologize for the lack of clarity in the 4.10. 23 request. Please treat the request of 4.10.23 as a separate request, as amended 4/28/23 below:

“HBS attorneys’ communications (and related records) with Coffee County voters and civic leaders (non-clients) regarding Coffee County election policies, pending election-related decisions of county officials, reviews of election-related records,, election activities, and voting system-related matters. (The period for this request is November 8, 2020 -June 30, 2021)..

Include all documents discussed and meeting notes used in or related to meetings conducted with Coffee officials when non-clients and former officials, (such as Ed Voyles, Cathy Latham, or the Dominion Tech assigned to Coffee County), were present during the period November 8, 2020 through June 30, 2021."

Examples of such records include Mr. Rowell's text messages and emails with Mr. Voyles or Ms. Latham concerning the 2020 and 2021 (senate runoff) elections in Coffee County or Georgia, including records related to the SOS investigations, recount and audit activities, potential legal actions, and all records evidencing any aspect of the unauthorized access to the voting system. This includes Mr. Rowell's meetings with Mr. Voyles and Ms. Latham related to Coffee County elections. (These are examples only, and not limitations on the responsive documents.)

Examples also include Mr. Rowell's Coffee County election-related communications with, or related to, Preston Haliburton, Robert Sinners, Alex Kaufman, Rudy Giuliani, SullivanStrickler representatives, Sidney Powell, Scott Hall, Alex Cruce, Bob Cheeley, Doug Logan, Jeffrey Lenberg, Jim Penrose, representatives of Dominion Voting Systems, and representatives of The Hilbert Law Firm.

The above examples are simply examples, and not limitations on the scope of the responsive documents we seek.

If any documents are withheld based on a claimed privileged, please provide the specific privileged asserted and the specific documents to which it applies.

This request is submitted by Coalition for Good Governance, Jeanne Dufort, and Marilyn Marks as an individual.

Marilyn Marks
Executive Director
[Coalition for Good Governance](#)
Cell: [REDACTED]
Follow me [@MarilynRMarks1](#)

From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>
Date: Friday, April 21, 2023 at 3:23 PM
To: Marilyn Marks <[REDACTED]>
Cc: "Vickers, Wesley" <Wesley.Vickers@coffeecounty-ga.gov>, Stephen Delk <SDelk@hallboothsmith.com>, "Vickers, Tracie" <Tracie.Vickers@coffeecounty-ga.gov>, "Anthony A. Rowell" <ARowell@hallboothsmith.com>
Subject: RE: Coffee County Response to Public records request Coffee 4.5.23 -- Communications with SOS attorneys

Marilyn, as you are aware, I am currently working my way through your numerous requests this afternoon. I apologize if I missed your response to my below email requesting clarification. (and I realized upon re-reading that the request for clarification may have also not

been as clear as I had intended, so I do apologize on my end also). With regard to same, please clarify your intent of what exactly you desire for my office to search – as currently worded the follow up language of the request is confusing and extremely broad. It is my intent to provide you with public records which are not otherwise privileged. This request is also overlapping with another request responded to this afternoon so that it may be that some documents will have already been produced responsive to same.

Thanks,

Jennifer

Jennifer Dorminey Herzog

Attorney at Law | Hall Booth Smith, P.C.

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From: Jennifer Dorminey Herzog

Sent: Friday, April 14, 2023 3:34 PM

To: Marilyn Marks <[REDACTED]>

Cc: Vickers, Wesley <Wesley.Vickers@coffeecounty-ga.gov>; Stephen Delk <SDelk@hallboothsmith.com>; Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov>; Anthony A. Rowell <ARowell@hallboothsmith.com>

Subject: RE: Coffee County Response to Public records request Coffee 4.5.23 -- Communications with SOS attorneys

Good afternoon. I have no less than 10 emails from you and/or your counsel Bruce Brown now sitting currently in my inbox regarding various requests for records, and I am wading through each and communicating with the necessary parties to properly and timely collect documents and respond to same, and doing my absolute best to be sure that nothing is missed (on top of all other client immediate needs).

Your initial request below dated 4.5.23 requested “*specific communications between Hall Booth Smith attorneys in their representation of Coffee County officials and attorneys for the Secretary of State of Georgia*” further delineating as “*between Jennifer Herzog, Anthony Rowell, Nick Kinsley, or Stephen Delk and certain attorneys representing the Secretary of State’s office during the period January 1, 2021 to the date of your response to this request. Such attorneys representing the Secretary of State include Charlene McGowan, Ryan Germany, and Steven Ellis*”

(of the General Counsel's office) and any attorney at the Taylor English firm (@taylorenghish.com) or the Robbins firm (@robbinsfirm.com)." In response to this request, I have been working to collect and compile responsive records and previously gave you and estimate that we could respond today.

However, your follow up email dated 4.10.23 appeared to greatly expand the request to documents not including in the previous request, including *"The search should include HBS attorneys' communications with Coffee County voters and civic leaders regarding Coffee County election policies, pending decisions, reviews of documents, election activities, and meetings conducted with Coffee officials when non-clients and former officials, such as Ed Voyles, Cathy Latham, or the Dominion Tech assigned to Coffee County were present."* This additional language is so vague and broad, without context of time or topic, it is almost impossible for me to determine even what Coffee County personnel I should request to search their records, much less what records are being requested. It may be this language was not intended to be included in this request – if so, please withdraw or clarify.

In light of this issue and the other technology challenges detailed under separate cover, although as I stated below I expected we would be able to produce the responsive documents to this particular request on or before today Friday 4/14/2023, because of various reasons that unfortunately will not be possible. It is my intention to work on your requests this weekend, I have mediations scheduled for Monday and Tuesday I expect to last most to all of the day, and so must update my estimate to have the records to you on or before Wednesday 4/19/23.

From: Marilyn Marks [REDACTED]
Sent: Monday, April 10, 2023 11:32 AM
To: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>; Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov>
Cc: Vickers, Wesley <Wesley.Vickers@coffeecounty-ga.gov>; Stephen Delk <SDelk@hallboothsmith.com>; Nick Kinsley <NKinsley@hallboothsmith.com>
Subject: Re: Coffee County Response to Public records request Coffee 4.5.23 -- Communications with SOS attorneys

Jennifer,

Please move forward with the search of communications outlined in the April 5 requests below. Our accountant is forwarding a check for \$300 as requested, but we ask that once the search is conducted, you review the work involved to determine whether the amount requested fully complies with the cost limitations imposed by Georgia Open Records statutes. As you are aware, the per hour cost is limited to the "prorated hourly salary of the lowest paid full-time employee who, in the reasonable discretion of the custodian of the records, has the necessary skill and training to perform the request." \$60 per hour seems quite high for the salary for someone conducting an email search of the firms' records for the limited scope requested below. Attorneys' fees cannot be charged for a review of records to be produced, under Georgia law. Further we should not be charged an elevated rate because of the firm's undergoing the unfortunate cybersecurity attack.

Also please note that we generally disagree with your potential objections which attempt to narrow the definition of public records which may be in possession of Hall Booth Smith. It goes without saying that the firm often has possession of official records of the County in its

role as legal counsel of the county, and the records cannot be considered as private records not subject to Georgia's Open Records Act merely because the record is in HBS files. Otherwise, a public body could circumvent the intent of government transparency embedded in the Open Records Act by having legal counsel create, receive and send official records of its transactions.

The search should include HBS attorneys' communications with Coffee County voters and civic leaders regarding Coffee County election policies, pending decisions, reviews of documents, election activities, and meetings conducted with Coffee officials when non-clients and former officials, such as Ed Voyles, Cathy Latham, or the Dominion Tech assigned to Coffee County were present.

Please undertake the search under the scope that we requested, and specifically identify by record any records that you withhold or deny for production with the specific statute citing the basis for withholding. Once such records are specifically identified, we can determine if we have disagreements on what can be legally withheld.

Please let me know if you have questions about our requests.

Marilyn Marks
Executive Director
[Coalition for Good Governance](#)
Cell: [REDACTED]
Follow me [@MarilynRMarks1](#)

From: Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>
Date: Friday, April 7, 2023 at 12:41 PM
To: Marilyn Marks <[REDACTED]>, "Vickers, Tracie"
<Tracie.Vickers@coffeecounty-ga.gov>
Cc: "Vickers, Wesley" <Wesley.Vickers@coffeecounty-ga.gov>, "Vickers, Tracie"
<Tracie.Vickers@coffeecounty-ga.gov>, Stephen Delk <SDelk@hallboothsmith.com>, Nick Kinsley <NKinsley@hallboothsmith.com>
Subject: Coffee County Response to Public records request Coffee 4.5.23 -- Communications with SOS attorneys

Marilyn,

We respond to these requests in good faith but also expressly reserve the right to object to the validity of an open records request served on a private law firm providing legal services to a county in Georgia, including the argument that HBS and its attorneys and staff do not perform a government function that Coffee County would otherwise be required to perform under the law; therefore, that HBS does not prepare, maintain or receive any records, or hold records "on behalf of" the County that would be defined as public records of Coffee County under the Georgia Open Records Act, OCGA 50-18-70 et seq. We further object in that all records held in HBS' possession are arguably privileged as either attorney client communication and/or attorney work product in accordance with O.C.G.A. 50-18-72(a)(41) and (42). Lastly, we note that as drafted many of your requests are so broad they could also be interpreted to include any private

communications, texts, emails, etc. unrelated to county business or the role of providing counsel to Coffee County or the Coffee County Board of Elections; however, those would not be included in the definition of a "public record" in O.C.G.A. 50-18-70(b)(2) and therefore not required to be produced in response to your request. As you are aware, HBS was the victim of a cyber breach on Saturday February 4, 2023 that has affected our electronic files.

With the above said, I have requested the attorneys at HBS referenced below search for and produce to me communications between our office and the names you reference below. Although we do not believe there are extensive documents to produce, in light of the security breach and the issues that have resulted from same, it will take extensive time to confirm what documents are in fact in existence. We estimate it will take 5 hours at \$60 per hour. Please forward payment to Trace as previously directed and we will begin to collect the responsive documents. Assuming timely receipt of your agreement to this amount, we expect we will be able to produce the responsive documents on or before next Friday 4/14/2023.

Sincerely,

Jennifer

Jennifer Dorminey Herzog

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From: Marilyn Marks <[REDACTED]>

Sent: Wednesday, April 5, 2023 9:25 AM

To: Vickers, Tracie <Tracie.Vickers@coffeecounty-ga.gov>; Jennifer Dorminey Herzog <jherzog@hallboothsmith.com>

Subject: Public records request Coffee 4.5.23 --Communications with SOS attorneys

Tracie and Jennifer,

This is an open records request for specific communications between Hall Booth Smith attorneys in their representation of Coffee County officials and attorneys for the Secretary of State of Georgia. Please provide these records in electronic format within three business days.

Please provide all communications (including related documents) between Jennifer Herzog, Anthony Rowell, Nick Kinsley, or Stephen Delk and certain attorneys representing the Secretary of State's office during the period January 1, 2021 to the date of your response to this request. Such attorneys representing the Secretary of State include Charlene McGowan, Ryan Germany, and Steven Ellis (of the General Counsel's office) and any attorney at the Taylor English firm (@taylorenghish.com) or the Robbins firm (@robbinsfirm.com).

Any responsive communications that include Curling case plaintiffs' attorneys or Marilyn Marks as senders or recipients are excluded from this request. Any documents previously produced to Marilyn Marks or Curling case plaintiffs are also excluded from this request.

Do not exclude responsive records contained in files, email accounts, or devices in the personal custody of officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Open Records Act.

If any responsive documents are withheld from this request, they should be identified and the statutory basis for the denial should be provided.

Thank you for your assistance. Of course feel free to call me if any clarification is needed.

Marilyn Marks
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